

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

**VALERIE GREY and  
BRIDGET SMITH,**

**Plaintiffs,**

**v.**

**SOURCECORP, INC.,**

**Defendant.**

**CIVIL ACTION NUMBER:  
2:05-cv-01039-MEF-CSC**

**MOTION FOR ADDITIONAL TIME TO RESPOND TO PLAINTIFFS' COMPLAINT**

Defendant Image Entry of Alabama, Inc. (dba SOURCECORP Business Process Solutions) (hereinafter "Defendant" or "Image Entry"), incorrectly named in Plaintiffs' Complaint as "Sourcecorp," by and through its undersigned counsel hereby respectfully requests that this Court grant it a fourteen (14) day extension of time in which to respond to Plaintiffs' Complaint so that Defendant's Answer is due to be filed on December 19, 2005. As grounds therefor, Image Entry states as follows:

1. Plaintiffs filed this lawsuit on or about October 28, 2005, and Image Entry was served on or about November 15, 2005.
2. The undersigned counsel have been retained to represent Image Entry in this action.
3. Image Entry and the undersigned have not yet completed their analysis of the allegations contained in Plaintiffs' Complaint, including, but not limited to, which defenses may operate to bar Plaintiffs' claims in part or in whole.
4. Additionally, personnel employed by Image Entry who are designated to work with the undersigned in drafting and approving Image Entry's Answer will be

difficult to reach between now and December 5, 2005 (the current deadline for filing the Answer) due to the Thanksgiving holidays and pre-planned personal vacations.

5. A fourteen-day extension of the deadline for filing an Answer would allow Image Entry to file a more complete, accurate, and thorough response to Plaintiffs' Complaint, and will not prejudice the parties or this Court insofar as this motion constitutes Image Entry's initial appearance, allowing the parties to proceed with scheduling the parties' planning meeting.

6. The undersigned has consulted Plaintiffs' counsel and Plaintiffs' counsel has no objection to the granting of this motion.

WHEREFORE, PREMISES CONSIDERED, Image Entry respectfully requests the Court allow it until December 19, 2005 to respond to Plaintiffs' Complaint.

Respectfully submitted,

s/Donna Eich Brooks  
David J. Middlebrooks ASB 8553-D58D  
Donna Eich Brooks ASB-9566-O60D

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 23, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Wiggins, Childs, Quinn & Pantazis, P.C.  
Jon C. Goldfarb, Esq.  
Maury S. Weiner, Esq.  
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s/Donna Eich Brooks  
OF COUNSEL

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